

REMARKS

This Amendment is in response to the Office Action mailed on March 19, 2004. The Examiner's comments have been carefully considered.

Claim 1 has been rejected, although the remaining claims 2-41 and 59-122 have been objected to and it has been indicated that they would be allowable if formal objections are overcome.

Claim 1 has been rejected as being obvious on the basis of the primary U.S. Patent No. 5,838,247 to Bladowski in view of the secondary U.S. Patent No. 6,033,087 to Shozo et al. The Examiner's reasoning in making the rejection is set forth in paragraph 4 bridging pages 2 and 3 of the Office Action. The Examiner's position is that Bladowski discloses the claimed invention set forth in claim 1 except for the recitation that each of the diode beams is directed to a predetermined fixed remote focal point. The Examiner relies on Shozo et al. for the disclosure of a "diode configuration that has a plurality of diodes each of which has a discrete beam directed to a substantially fixed remote area." Thus, the Examiner concludes that Shozo et al. teaches providing focusing means for "focusing light at a predetermined focal point for light-emitting diodes." For reasons that are more specifically set forth below, applicant respectfully traverses the Examiner's rejection and requests reconsideration and withdrawal of the same.

Even if the Examiner is correct that Bladowski teaches most of the elements or features recited in claim 1, the Examiner concedes that Bladowski fails to teach a structure in which the diodes have discrete beams directed to a fixed remote focal point.

In fact, Bladowski teaches quite the contrary. In the Abstract of the Disclosure, for example, the patentee states that the objective of the solid state light system disclosed in the Bladowski patent is to provide a light source concentration that is “larger than the projected area of the lamp.” Therefore, far from discussing LED lamps in which each directs its beam to a central focal point, the patent is primarily concerned with dispersing the light over a generally large area. There is nothing in Bladowski that provides the incentive, teaching or suggestion that each of the LEDs be focused to a single focal point.

Turning to Shozo et al., this patent teaches an LED illuminating device for providing a uniform light spot. However, it is clear that Shozo et al. fails to teach a mounting template on which there is simultaneously positioned a plurality of diodes, “wherein each discrete light beam is directed to a predetermined, substantially fixed remote focal point,” as required by claim 1. In this connection, the Examiner’s attention is respectfully directed, for example, to Figs. 9, 10, 12a, 12b, 12c, 12d, 14, 15, 17, 18, 20 and 21 of the subject application, in which each of the diodes is mounted on the frame means so that, as clearly taught in the subject application, there is no need or requirement for any other optical components to redirect the individual light beams. In Shozo et al., as best shown in Figs. 1 and 2 of that patent, the patentees utilize a series of additional optical elements, including a lens 6 and a donut-shaped polarizing prism 5, in order to redirect the light beams of the individual LEDs that are otherwise all mounted with their optical axes parallel to each other as best shown in Fig. 1. There is nothing in Shozo et al. to teach a manner of mounting LEDs on a frame of the type including a rigid mounting template forming a fixed hollow volume, as taught in the subject application – that is, unless one adds a substantial number of additional optical elements at a substantial additional cost. It is respectfully submitted that the fact that Shozo et al. felt

compelled to resort to the use of additional and costly optical elements confirms that the subject matter of the subject application's claim 1 was not obvious to Shozo et al. If this subject matter had been obvious, the patentee could have foregone using such additional elements.

Furthermore, it is believed that it would not be obvious to combine Bladowski and Shozo et al. as it would extremely costly, if it were possible at all, to utilize the optical systems of Shozo et al. with the solid state light system of Bladowski. Bladowski uses a large multitude of LED diodes, and it would be difficult if not impossible to provide the optical light beam redirecting optics of Shozo et al. for each LED in Bladowski. For this reason as well it is believed that it would not be obvious to combine Bladowski and Shozo et al. And even if such combination were to be made, it is respectfully submitted that further and significant modifications to the optical system of Shozo et al. would have to be made to accommodate all of the LEDs in Bladowski.

It is believed, therefore, that Shozo et al. does not teach the underlying concept of the present application as defined in claim 1, and that the subject invention would not be obvious without the hindsight and the teachings of the present application.

In view of the foregoing, it is respectfully submitted that it would not be obvious to one skilled in the art to combine Bladowski and Shozo et al. as proposed by the Examiner and that, furthermore, even if such combination were to be made, it would not be obvious to a person skilled in the art as to how the two teachings could be combined and modified in order to achieve the subject invention, as currently defined in claim 1.

In view of the above, it is respectfully submitted that all of the claims in the subject application are in condition for allowance. It is noted that all extra independent and extra claim fees have been previously submitted with the filing of this application

and with the last submitted Amendment. Early allowance and issuance is, according,
respectfully solicited.

Applicant hereby petitions that any and all extensions of time of the term necessary to render this response timely be granted. COSTS FOR SUCH EXTENSION(S) AND/OR ANY OTHER FEE DUE WITH THIS FEE DUE WITH THIS PAPER THAT ARE NOT FULLY COVERED BY AN ENCLOSED CHECK MAY BE CHARGED TO DEPOSIT ACCOUNT #10-0100.

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I hereby certify that this correspondence is being filed by depositing same in an envelope stamped first-class mail, addressed to the Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450, in a duly marked U.S. Postal Service drop box, with appropriate postage, on the following date:

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Name 

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June 21, 2004

Date